

FILED

JUL 10 2012


CLERK

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

UNITED STATES OF
AMERICA,

CR 12-40039

Plaintiff,

SUPERSEDING INDICTMENT

vs.

Sex Trafficking by Force, Fraud, or
Coercion; Interstate Transportation for
Prostitution; Sex Trafficking of a Child;
Obstruction of Sex Trafficking
Enforcement

CARL CAMPBELL, aka "Nutty
Boy," aka Carl Smith, aka
Karl Campbell, aka Earl
Campbell, aka Carl Michael,

18 U.S.C. §§ 2(a), 2(b), 1591(a)(1),
1591(a)(2), 1591(b)(1), 1591(b)(2),
1591(c), 1591(d), 2422

Defendant.

The Grand Jury charges:

COUNT ONE

(Sex Trafficking By Force, Fraud, or Coercion)

Beginning on or about August 1, 2010, and continuing through on or about July 31, 2011, all dates being approximate and inclusive, in the District of South Dakota and elsewhere, in and affecting interstate and foreign commerce, Defendant Carl Campbell, aka "Nutty Boy," aka Carl Smith, aka Karl Campbell, aka Earl Campbell, aka Carl Michael, did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, a person, to-wit: M.A., whose identity is known to the Grand Jury, knowing and recklessly disregarding that

means of force, threats of force, fraud, and coercion would be used to cause M.A. to engage in a commercial sex act, and did benefit, financially and by receiving anything of value from participation in a venture engaged in such acts, in violation of 18 U.S.C. §§ 1591(a)(1), 1591(a)(2), 1591(b)(1), and did aid, abet, counsel, command, induce, procure, and willfully cause the same, in violation of 18 U.S.C. §§ 2(a) and 2(b).

COUNT TWO
(Interstate Transportation for Prostitution)

Beginning on or about August 1, 2010, and continuing through on or about July 31, 2011, all dates being approximate and inclusive, in the District of South Dakota and elsewhere, Defendant Carl Campbell, aka "Nutty Boy," aka Carl Smith, aka Karl Campbell, aka Earl Campbell, aka Carl Michael, did knowingly persuade, induce, entice, and coerce an individual, to-wit: M.A., whose identity is known to the Grand Jury, to travel in interstate commerce to engage in prostitution, and attempted to do so, in violation of 18 U.S.C. § 2422.

COUNT THREE
(Sex Trafficking of a Child - Child Victim #1)

Between on or about September 1, 2009, and continuing through on or about July 31, 2011, all dates approximate and inclusive, in the District of South Dakota and elsewhere, in and affecting interstate and foreign

commerce, Defendant Carl Campbell, aka "Nutty Boy," aka Carl Smith, aka Karl Campbell, aka Earl Campbell, aka Carl Michael, did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, a person, to-wit: Child Victim #1, whose identity is known to the Grand Jury, knowing and recklessly disregarding that Child Victim #1 had not attained the age of 18 years and having had a reasonable opportunity to observe Child Victim #1, knowing and recklessly disregarding that Child Victim #1 would be caused to engage in a commercial sex act, in violation of 18 U.S.C. §§ 1591(a)(1), 1591(b)(2), and 1591(c), and did aid, abet, counsel, command, induce, procure, and willfully cause the same, in violation of 18 U.S.C. §§ 2(a) and 2(b).

COUNT FOUR
(Obstruction of Sex Trafficking Enforcement)

Beginning on or about October 1, 2011, and continuing through on or about May 31, 2012, all dates being approximate and inclusive, in the District of South Dakota and elsewhere, Defendant Carl Campbell, aka "Nutty Boy," aka Carl Smith, aka Karl Campbell, aka Earl Campbell, aka Carl Michael, did obstruct, attempt to obstruct, and did interfere with and prevent the enforcement of 18 U.S.C. § 1591 et seq., in violation of 18 U.S.C. § 1591(d).

A TRUE BILL:

BRENDAN V. JOHNSON
UNITED STATES ATTORNEY

By: 